

Kellie Martinec

From: joshuagrimes@prairielandsgcd.org
Sent: Monday, April 01, 2013 10:47 AM
To: rulescoordinator
Cc: afriedman@lglawfirm.com; Charles Beseda (charlesbeseda@yahoo.com); Brian Sledge
Subject: comments to proposed Commission Rule 3.13
Attachments: Final Draft Prairielands GCD Letter re Comments to Rule 3 13 RCT Proposed Rules 2013 03 26.docx

Attention Rules Coordinator, attached for submission are comments to proposed Commission Rule 3.13 on behalf of the Prairielands Groundwater Conservation District.

Sincerely,

A handwritten signature in dark ink, appearing to read "Joshua Grimes", is written over a horizontal dashed line.

Joshua Grimes
General Manager
Prairielands GCD

PRAIRIELANDS GROUNDWATER CONSERVATION DISTRICT
ELLIS, HILL, JOHNSON AND SOMERVELL COUNTIES

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April 1, 2013

Rules Coordinator
Railroad Commission of Texas
Office of General Counsel
P.O. Drawer 12967
Austin, Texas 78711-2967

Re: Comments on Proposal to amend 16 Tex. Admin. Code § 3.13 – “Casing, Cementing, Drilling, and Completion Requirements”

To The Honorable Railroad Commission of Texas and Staff:

The Prairielands Groundwater Conservation District appreciates the work undertaken by the Commission and staff to propose changes to Rule 3.13 (regarding “Casing, Cementing, Drilling, and Completion Requirements.”) The District offers the following comments in response to the rule amendments published in the Texas Register on February 15, 2013. We encourage you to consider these comments while recognizing the importance of adopting rules that afford effective protection of groundwater quality.

The changes proposed to Title 16, Section 3.13 of the Texas Administrative Code address cementing requirements, which include revisions to minimum cementing requirements based on the method utilized for determining the top of cement. The District is concerned that the revisions, as proposed, would not sufficiently protect underground sources of drinking water or usable-quality water from migration of contaminants. Accordingly, the District encourages the Commission to consider making the following changes to the proposed rules:

(1) Revise the definition of “Zone of critical cement for intermediate or production casing strings” stated in Title 16 Section 3.13(a)(2)(B)(ii) of the Texas Administrative Code to read as follows:

“... the bottom 20% of the casing string but not less than ~~300~~ 500 feet above the casing shoe or proposed productive zone.”

(2) With regard to casing and cementing requirements above all formations permitted for injection under Section 3.9 and Section 3.46 of the Commission's rules, the District suggests revising Title 16, Section 3.13(a)(4)(C) of the Texas Administrative Code to read as follows:

"Casing shall be cemented across and extending at least 600 feet above all formations permitted for injection under Section 3.9 of this title (relating to Disposal Wells), or Section 3.46 of this title (relating to Fluid Injection into Productive Reservoirs), within one-quarter mile of the proposed well location in the following manner:"

(3) With regard to casing and cementing requirements above all formations permitted for injection under Section 3.9 and Section 3.46, the District suggests modifying Title 16, Section 3.13(a)(4)(C)(ii) of the Texas Administrative Code to read as follows:

"If the top of cement is determined through the performance of a temperature survey, across and extending ~~250~~ 500 feet (measured depth) above the permitted formation(s).

(4) With regard to casing and cementing requirements above all formations permitted for injection under Section 3.9 and Section 3.46, the District suggests modifying Title 16, Section 3.13(a)(4)(C)(iii) to read as follows:

"... if the top of cement is determined through the performance of a cement evaluation log, across and extending ~~100~~ 500 feet (measured depth) above the permitted formation(s)."

(5) With regard to casing and cementing requirements above all productive zones, potential flow zones, and/or zones with corrosive formation fluids, the District suggests modifying Title 16, Section 3.13(a)(4)(D)(ii) of the Texas Administrative Code to read as follows:

"... if the top of cement is determined through the performance of a temperature survey, across and extending ~~250~~ 500 feet (measured depth) above the zones."

(6) With regard to casing and cementing requirements above all productive zones, potential flow zones, and/or zones with corrosive formation fluids, the District suggests modifying Title 16, Section 3.13(a)(4)(D)(iii) of the Texas Administrative Code to read as follows:

"... if the top of cement is determined through the performance of a cement evaluation log, across and extending ~~100~~ 500 feet (measured depth) above the zones."

(7) With regard to cementing intermediate casing requirements for land wells and bay wells, the District suggests modifying Title 16, Section 3.13(b)(2)(A)(ii) of the Texas Administrative Code to read as follows:

"... if the top of cement is determined through performance of a temperature survey, from the shoe up to a point at least ~~250~~ 500 feet (measured depth) above the top of the shallowest productive zone, potential flow zone, or zone with corrosive formation fluids;"


(8) With regard to cementing intermediate casing requirements for land wells and bay wells, the District suggests modifying Title 16, Section 3.13(b)(2)(A)(iii) of the Texas Administrative Code to read as follows:

“... if the top of cement is determined through performance of a cement evaluation log, from the shoe up to a point at least ~~100~~ 500 feet (measured depth) above the top of the shallowest productive zone, potential flow zone, or zone with corrosive formation fluid;”

The District feels strongly that the suggested revisions will more adequately prevent migration of fluids that could otherwise endanger the groundwater used by our constituents. Requiring cementing in the manner proposed by the District would serve to better protect these critical resources for generations to come.

Thank-you-again for the opportunity to provide these comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Joshua Grimes", with a long horizontal flourish extending to the right.

Joshua Grimes
General Manager